



Solutia Inc.
702 Clydesdale Avenue
Anniston, Alabama 36201 USA

August 9, 2021

Ms. Pamela J. Langston Scully, P.E.
Remedial Project Manager
United States Environmental Protection Agency, Region IV
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960

**RE: July 2021 Progress Report
Anniston PCB Site (Docket No. 1:02-cv-0749-KOB)
Anniston, Alabama**

Dear Ms. Langston Scully:

Please find attached the July 2021 Progress Report for the Partial Consent Decree between Solutia Inc., Pharmacia LLC (collectively P/S) and the United States Environmental Protection Agency (EPA) entered by the United States District Court for the Northern District of Alabama (Court) on August 4, 2003, the Consent Decree for Remedial Design/Remedial Action for Operable Unit No. 3 between P/S and the EPA entered by the Court on April 17, 2013, and the Consent Decree for Remedial Design/Remedial Action for Operable Unit Nos. 1 and 2 between P/S and the EPA entered by the Court on March 26, 2021. This report describes the work performed, unanticipated issues encountered, and analytical data received during the reporting period of July 1, 2021, through July 31, 2021. The report also describes upcoming developments anticipated for the months of August and September 2021.

If you should have any questions concerning this matter or need additional information, please call me at (256) 231-8404.

Sincerely,

E. Gayle Macolly
Manager, Remedial Projects
Solutia Inc.

Attachments

cc: Ms. Sonja Favors (ADEM)
Mr. Thomas Dahl



JULY 2021 PROGRESS REPORT
ANNISTON PCB SITE
(DOCKET NO. 1:02-cv-0749-KOB)
ANNISTON, ALABAMA

USEPA I.D. No. ALD 004 019 048

Submitted For:

Solutia Inc. and Pharmacia LLC
702 Clydesdale Avenue
Anniston, Alabama 36201

August 9, 2021

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1.0 INTRODUCTION

1.1 2003 Partial Consent Decree

This monthly progress report has been prepared in accordance with the requirements of the 2003 Partial Consent Decree (2003 CD) between the United States Environmental Protection Agency (EPA), Solutia Inc. (Solutia), and Pharmacia LLC (Pharmacia) entered by the United States District Court for the Northern District of Alabama (the Court) on August 4, 2003 (Docket No. 1:02-cv-0749-KOB). The 2003 CD was issued under Sections 106, 107, and 113(g)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §§9606, 9697, §9613(g)(2). The 2003 CD provides for the performance of studies and response work by Solutia and Pharmacia at the Anniston PCB Site (Site) as defined by the 2003 CD. Solutia and Pharmacia, with Monsanto performing work on behalf of Pharmacia, are referred to as “P/S” in the subsequent sections of this report.

In accordance with Appendix A Section XIII (47), Appendix B Task 2, and Appendix G Section VI (2.5) of the 2003 CD, Section 2.0 of this report describes the work performed during the period of July 1, 2021 through July 31, 2021, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 5.1 of this report also describes upcoming developments anticipated over the next two months for the work required by the 2003 CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

1.2 2013 Operable Unit 3 (OU-3) Remedial Design/Remedial Action Consent Decree

The Consent Decree for the Remedial Design/Remedial Action for Operable Unit 3 (OU-3 RD/RA CD) between the EPA and P/S was entered by the Court on April 17, 2013 (Docket No. 1:02-cv-0749-KOB). The OU-3 RD/RA CD, which encompasses the Solutia plant and the adjacent closed South and West Landfills, provides for the implementation of the remedies selected for OU-3 as described in the Interim Record of Decision (IROD) issued by Region 4 of the EPA on September 29, 2011.

In accordance with Section X. Paragraph 31 of the OU-3 RD/RA CD, Section 3.0 of this report describes the work performed for the OU-3 RD/RA during the period of July 1, 2021 through July

31, 2021, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 5.2 of this report describes the upcoming developments anticipated over the next two months for the work required by the OU-3 RD/RA CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

1.3 2021 Operable Unit 1/ Operable Unit 2 (OU-1/OU-2) Remedial Design/Remedial Action Consent Decree

The Consent Decree for the Remedial Design/Remedial Action for Operable Unit 1/Operable Unit 2 (OU-1/OU-2 RD/RA CD) between the EPA and P/S was entered by the Court on March 26, 2021 (Docket No. 1:02-cv-00749-KOB). The OU-1/OU-2 RD/RA CD provides for the implementation of the remedies selected for OU-1/OU-2 as described in the OU-1/OU-2 Record of Decision issued by Region 4 of the EPA on November 9, 2017. This includes remedial actions for soils, sediments and groundwater at residential and non-residential properties outside of the plant site (OU-3).

In accordance with the OU-1/OU-2 RD/RA CD Scope of Work (Appendix B Paragraph 5.1), Section 4.0 of this report describes the work performed for the OU-1/OU-2 RD/RA CD during the period of July 1, 2021 through July 31, 2021, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 5.3 of this report describes the upcoming developments anticipated over the next two months for the work required by the OU-1/OU-2 RD/RA CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

2.0 2003 CD WORK PERFORMED DURING REPORTING PERIOD

2.1 General 2003 CD Activities

2.1.1 Administrative Submittals

A 2003 CD submittal schedule for the Site that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 1. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

2.2 Operable Unit 1/Operable Unit 2 (OU-1/OU-2)

2.2.1 Residential Removal Properties Program

The residential program consists of residential work associated with the 2003 CD. This includes the non-time critical (NTC) residential activities as well as time critical residential activities associated with the Administrative Order on Consent (AOC), effective October 5, 2001.

During this reporting period, P/S continued to work with the local municipalities and property owners to implement the approved NTC Removal Action Interim IC Program for Residential Properties (Interim IC Program). Table 2 provides a summary of the number of properties in each IC group.

2.2.1.1 Residential Removal Access

Access activity includes updating owner/tenant information, access request information, and/or EPA notification of non-compliance information. During this reporting period, there were no access activities.

Currently there are 12 residential properties in the Residential Removal Properties Program where access has not been granted. The properties are summarized in Table 3, and a description of each property's status is presented in Table 4.

2.2.1.2 Residential Removal Activities

During this reporting period, P/S did not perform any surface or depth sampling associated with residential removal properties in OU-1/OU-2.

On June 8, 2021, EPA approved a modification to the typical residential removal procedure requested by the owner at 1035 Parker Street. The owner of the formerly unsuitable property requested that P/S not replace the top foot of soil in an elevated area, so the property will be more level. During this reporting period, P/S' residential removal contractor Allen Hall Excavating completed the removal action at 1035 Parker Street located in Zone C.

2.3 Operable Unit 4 (OU-4)

During this reporting period, P/S did not perform any surface or depth sampling associated with residential removal properties in OU-4. Residential properties are summarized in Table 5.

Currently there is one residential property in the OU-4 Residential Removal Properties Program where access has not been granted. A description of the removal property's status is presented in Table 6.

During this reporting period, P/S continued to provide construction support for the Dewatering Facility project at the Choccolocco Creek Waste Water Treatment Plant in accordance with the approved construction support work plan. This project is scheduled to be completed by November 2021. On July 29, 2021, P/S requested approval via email to complete additional soil sampling for the installation of a subsurface communication line in support of this project. EPA approval is pending.

On January 20, 2021, P/S received comments from the EPA on the Technical Memorandum Summarizing Results of Comparative Analysis of Alternatives for OU-4. P/S will address these comments during the preparation of the OU-4 Feasibility Study (FS). On May 3, 2021, P/S requested an additional thirty day extension for submitting the OU-4 FS. On May 6, 2021, the EPA and the Court approved the request to extend the schedule to prepare the OU-4 FS. P/S submitted the OU-4 FS on June 21, 2021. EPA approval is pending.

2.4 Technical Assistance Plan Grant

The Technical Advisor, Mr. Bertrand Thomas, P.G., continues to review Site-related documents and convey information from these documents to the CAG and the community.

2.5 Community Advisory Group

A CAG meeting was held on July 13, 2021 via video teleconference. The meeting was open to the public to allow residents to observe the working session and comment or ask questions. Topics discussed at the CAG meeting included:

- an update from the Technical Advisor;
- an update from the EPA; and
- an update from P/S.

The next CAG meeting is scheduled for September 14, 2021, and will be held via video conference.

3.0 OU-3 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD

3.1 General OU-3 RD/RA CD Activities

3.1.1 Administrative Submittals

A CD submittal schedule for OU-3 that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 7. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

3.2 Remedial Action

P/S are currently preparing a revised Institutional Controls Implementation and Assurance Plan (ICIAP) that documents the final remedial components performed as part of the completed RA work. The revised ICIAP will include an executed Environmental Covenant as required by the IROD. The Environmental Covenant has been executed by both P/S and ADEM and was recorded by the Calhoun County Probate Judge on February 16, 2021.

4.0 OU-1/OU-2 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD

4.1 General OU-1/OU-2 RD/RA CD Activities

4.1.1 Administrative Submittals

A CD submittal schedule for the OU-1/OU-2 RD/RA CD that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 8. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

P/S submitted the Remedial Design Work Plan (RDWP) on June 14, 2021. The EPA provided comments to the RDWP on July 20, 2021. P/S are currently preparing a revised RDWP to address these comments and are expected to submit it on or before August 19, 2021.

On April 12, 2021, P/S submitted the Notice of Financial Assurance Mechanism to the EPA in accordance with Section IX Paragraph 26 of the OU-1/OU-2 RD/RA CD. P/S received EPA approval for the proposed financial assurance mechanism on May 24, 2021. P/S submitted the executed financial assurance mechanism to the EPA on June 15, 2021. P/S submitted a copy of the Executed Financial Assurance Mechanism on corporate letterhead on July 1, 2021.

4.1.2 OU-1/OU-2 Non-Residential Program

P/S continued to perform the required routine inspections of the Central Staging and Soil Management Area (CSSMA) and South Staging and Soil Management Area (SSSMA) during this reporting period. No adverse findings were noted during the inspections.

On July 26, 2021, Spire Inc. began an additional phase of the project in the Anniston and Oxford areas to replace the existing natural gas service and supply lines. P/S are currently working with Spire Inc. by providing staging, transportation and disposal services for the PCB impacted soils generated from this infrastructure support project. P/S's support efforts for this phase of the project are similar to those outlined in the October 16, 2019 memo previously submitted to the EPA. This project phase is expected to be completed in January 2022.

On July 27, 2021, P/S submitted a construction support work plan for the Alabama Power Company (APCO) 4th Street Substation Project. APCO recently purchased a portion of the property located

at 0 W. 4th Street (PPIN 18311) to develop a new substation. This property was previously designated a special use property and two high-activity areas were previously remediated. The proposed substation is primarily located within the overgrown low-activity areas of this former special use property. P/S plan to manage soil disposal, equipment decontamination and maintaining waste manifests consistent with other soil management projects. EPA approval is pending.

4.1.3 11th Street Ditch

P/S will perform the next quarterly routine inspections in September 2021.

5.0 WORK SCHEDULED

5.1 2003 CD Work Activities

During the months of August and September 2021, the following work elements are anticipated:

- Obtain and/or process access for performing residential sampling and removal activities in OU-1/OU-2 according to the Supplemental Sampling and Analysis Plan (SSAP) and the Addendum to the NTC Removal Action Work Plans for the Site (as necessary);
- Perform surface, depth, indoor dust and/or crawl space sampling of residential properties in OU-1/OU-2 as access is provided (as necessary);
- Perform residential removal activities according to the associated work plans (as necessary);
- Provide construction support for the Dewatering Facility project at the Choccolocco Creek Waste Water Treatment Plant (as necessary);
- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval; and
- The CAG will hold a regularly scheduled meeting on September 14, 2021.

5.2 OU-3 RD/RA CD Work Activities

During the months of August and September 2021, the following work elements are anticipated:

- Prepare and submit a revised ICIAP.

5.3 OU-1/OU-2 RD/RA CD Work Activities

During the months of August and September 2021, the following work elements are anticipated:

- Perform CSSMA and SSSMA inspection and maintenance requirements in accordance with the approved CSSMA Operating and Closure Plan, the approved SSSMA Operating and Closure Plan, and the SSSMA Interim Operations and Maintenance Plan;
- Perform 11th Street Ditch inspection and maintenance requirements in accordance with approved schedule;
- Prepare and submit a revised RDWP;
- Provide construction support for the Quintard Mall redevelopment project (as necessary);
- Provide construction support for the Spire Inc. gas line replacement project;
- Provide construction support for the APCO 4th Street Substation project (as necessary); and

- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval.

TABLES

TABLE 1
PARTIAL CONSENT DECREE SUBMITTAL SCHEDULE
ANNISTON PCB SITE
Anniston, Alabama

Administrative Issues

Reports

Updated Interim Operations and Maintenance Plan (2012) - South Staging and Soil Management Area	Submitted to EPA Approval Pending	May 2, 2012
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site	Submitted to EPA Comments Received Revision Submitted	July 31, 2012 May 16, 2013 November 12, 2015
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 1	Submitted to EPA	August 3, 2016
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 2	Submitted to EPA	July 14, 2017
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 3	Submitted to EPA	June 4, 2018
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 4	Submitted to EPA	June 26, 2019
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 5	Submitted to EPA	April 24, 2020
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 6	Submitted to EPA Approval Pending	June 9, 2021
South Staging and Soil Management Area, Interim Closure Report - Addendum No. 7	Submitted to EPA Approval Pending	June 4, 2018
West 11th Street Sewer Line Repair Construction Completion Report - City of Anniston Water Works and Sewer Board	Submitted to EPA Approval Pending	June 12, 2018
Snow Street Drainage Improvement Project Completion Report Closure Report - Addendum No. 1	Submitted to EPA Approval Pending	July 10, 2019
OU-4 Sediment Stability Technical Memorandum	Submitted to EPA Approval Pending	June 30, 2010
Former Holiday Inn Redevelopment Project Completion Report ⁽¹⁾	Submitted to EPA Approval Pending	November 20, 2013
Miracle Field Construction Completion Report ⁽¹⁾	Submitted to EPA Approval Pending	June 19, 2014
Anniston Regional Airport Fence Installation Project Completion Report ⁽¹⁾	Submitted to EPA Approval Pending	July 23, 2014
Interstate 20 (I-20) Bridge System Over Snow Creek Remedial Measures Completion Report ⁽¹⁾	Submitted to EPA Approval Pending	October 7, 2014
Colonial Pipeline Company Recoating Project Completion Report ⁽¹⁾	Submitted to EPA Approval Pending	November 5, 2014
Operable Unit 4 Feasibility Study	Submitted to EPA Approval Pending	June 21, 2021
June 2020 Progress Report	Submitted to EPA	July 9, 2021

Work Plan

Notes:

⁽¹⁾ The approval is pending the completion of the Remedial Investigation/Feasibility Study process for OU-4.

TABLE 2

**INTERIM IC GROUP COUNTS
ANNISTON PCB SITE
Anniston, Alabama**

Area	IC Group 2¹	IC Group 3²	IC Group 4³	Total
OU-1/2	318	100	47	465
OU-4	12	5	1	18
Total	330	105	48	483

¹⁾ IC Group 2 includes properties where residual PCB-containing soil may remain on the property but such presence has not been confirmed (e.g., PCBs beneath structures or driveways).

²⁾ IC Group 3 includes properties where PCB levels in the surficial soil are less than 1 ppm, but are between 1 and 10 ppm at 12 inches or more below the existing ground surface. IC Group 3 properties may also include improvements (e.g., houses, driveways) where residual PCB-containing soil may remain on the property but such presence has not been confirmed.

³⁾ IC Group 4 includes properties where PCB levels in the surficial soil are greater than 1 ppm and have not been remediated (due to access issues or unsuitable areas). IC Group 4 properties may also include improvements (e.g., houses or driveways) where residual PCB-containing soil may remain on the property but such presence has not been confirmed, and/or the property may contain PCBs between 1 and 10 ppm at 12 inches or more below the existing ground surface.

⁴⁾ 1035 Parker Street (Parcel ID 1635) moved from IC Group 4 to IC Group 2 based on completed removal action.

401 1st Avenue (Parcel ID 3584) moved from IC Group 2 to IC Group 1 (no further action) based on a structure being demolished and PCB results less than 1 ppm.

IC: Institutional Controls

PCBs: polychlorinated biphenyls

ppm: parts per million

TABLE 3

OU-1 RESIDENTIAL PROGRAM SUMMARY

ANNISTON PCB SITE

Anniston, Alabama

Residential Removal Action Program (Lead Site AOC Zone C and D) ⁽¹⁾	July 2021
No. of properties where access has been requested to surface sample	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust, and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	1
No. of properties where removal actions are in progress	0
Total no. of properties with PCB surface results < 1 ppm	1214
Total no. of properties with PCB surface results ≥ 1 ppm ⁽²⁾⁽³⁾	10
Total no. of removal action properties Unsuitable for Removal	19
Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)	9
Total no. of removal action properties completed by Solutia (as part of AOC and CD) ⁽³⁾⁽⁴⁾	368
Total no. of > 1 ppm PCBs removal action properties completed by EPA (confirmed)	8
Residential Removal Action Program (Lead Site AOC Zone C and D)	July 2021
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, dust, crawlspace, and/or demo samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
Total no. of properties with PCB surface results < 1 ppm in High Activity Areas	24
Total no. of removal action properties completed by Solutia (as part of AOC and CD)	9
Residential Removal Action Program (Lead Site AOC Zone A)	July 2021
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
Total no. of properties with PCB surface results < 1 ppm sampled by Solutia and/or EPA	440
Total no. of properties with PCB surface results ≥ 1 ppm and Lead <400 ppm	1
Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead <400 ppm in High Activity Areas	0
Total no. of removal action properties completed by Solutia (as part of AOC and CD)	81
Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)	2
Total no. of removal action properties Unsuitable for Removal	2

TABLE 3
OU-1 RESIDENTIAL PROGRAM SUMMARY
ANNISTON PCB SITE
Anniston, Alabama

Residential Removal Action Program (Lead Site AOC Zone B)	July 2021
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
Total no. of properties with PCB surface results < 1 ppm sampled by Solutia and/or EPA	525
Total no. of properties with PCB surface results ≥ 1 ppm and Lead <400 ppm	1
Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead <400 ppm in High Activity Areas	0
Total no. of removal action properties completed by Solutia (as part of AOC and CD)	120
Total no. of removal action properties Unsuitable for Removal	3

Notes:

⁽¹⁾Lead Site AOC Zones C and D represents Evaluation Areas 1-34. Properties in Evaluation Area 35 have been moved to OU-4.

⁽²⁾ Includes properties surface sampled by EPA. Does not include completed removal properties or EPA Lead Site Appendix 6 properties.

⁽³⁾ This total includes three properties where removals have previously been completed, but additional removals are required.

⁽⁴⁾ This total includes 3 Appendix 6 properties within Lead Site AOC Zones C and D where removals were completed by Solutia.

TABLE 4

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs RESULTS
FOR SURFACE COMPOSITE SAMPLES IN ZONES A - D
ANNISTON PCB SITE
Anniston, Alabama**

ADDRESS	GIS PARCEL ID	EVALUATION AREA	EPA Zone	PROPERTY STATUS
918 McDaniel Avenue	2217	11	D	Non-Responsive
621 Pine Street ⁽²⁾	2820	3	C	Non-Responsive
1407 Glen Addie Avenue ⁽²⁾	765	24	C	Non-Responsive
509 W. 13th Street	1136	24	C	Non-Responsive
916 McDaniel Avenue	2254	11	D	Owner Declined Access During Removal Initiation
124 W. 18th Street	207123	-	A	Owner Declined Access During Removal Initiation
1627 W. 13th Street	1061	21	C	Owner Declined Removal Access
2106 W. 10th Street	2128	15	D	Owner Declined Removal Access
3002 Jefferson Street	3410	-	B	Owner Declined Removal Access
807 Bancroft Avenue	2443	34	D	Owner Declined Removal Access
716 Montrose Avenue ⁽²⁾	2500	11	D	Owner Not Found
Duncan Avenue (11-22-01-01-04-2-77) ⁽¹⁾	973	21	C	Owner Not Found

Notes:

⁽¹⁾ Portions of property are no longer unsuitable for removal.

⁽²⁾ Property requires additional removal action.

TABLE 5
OU-4 RESIDENTIAL PROGRAM SUMMARY
ANNISTON PCB SITE
Anniston, Alabama

Residential Removal Action Program	July 2021
No. of properties where access has been requested to surface sample	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust, and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
Total no. of properties with PCB surface results < 1 ppm	39
Total no. of properties with PCB surface results ≥ 1 ppm	1
Total no. of removal action properties completed by Solutia	19

TABLE 6

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs AND LESS THAN 400 PPM LEAD RESULTS
FOR SURFACE COMPOSITE SAMPLES IN OU-4
ANNISTON PCB SITE
*Anniston, Alabama***

ADDRESS	GIS PARCEL ID	PROPERTY STATUS
0 Howard Drive (07-06-14-0-000-004.00)	600117	Owner Declined Removal Access

TABLE 7

OU-3 CONSENT DECREE SUBMITTAL SCHEDULE
ANNISTON PCB SITE
Anniston, Alabama

Administrative Issues

Reports

OU-3 Construction Completion Report	Submitted to EPA	January 22, 2018
OU-3 Construction Completion Report Addendum	Submitted to EPA Approval Pending	July 27, 2018
OU-3 Operations and Maintenance Plan for Remedial/Corrective Action Projects: Revision 1.0	Submitted to EPA Approval Pending	August 7, 2018
OU-3 Seep Investigation Report	Submitted to EPA Comments Received Revision Submitted Approval Pending	August 31, 2020 January 22, 2021 June 10, 2021

Work Plan

Seep Investigation: Interim Results and Updated Work Plan	Submitted to EPA Approval Pending	November 25, 2019
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TABLE 8

OU-1/OU-2 CONSENT DECREE SUBMITTAL SCHEDULE

ANNISTON PCB SITE

*Anniston, Alabama***Administrative Issues**

Executed Financial Assurance Mechanism	Submitted to EPA	June 15, 2021
Executed Financial Assurance Mechanism on Corporate Letterhead	Submitted to EPA	July 1, 2021

Reports

Work Plan

Remedial Design/Remedial Work Plan OU-1/OU-2	Submitted to EPA Comments Received	June 14, 2021 July 10, 2021
Alabama Power, West 4th Street Substation Project	Submitted to EPA Approval Pending	July 27, 2021